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**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF NEVADA**

FRANK LA PENA,

Plaintiff,

v.

LAS VEGAS METROPOLITAN POLICE
 DEPARTMENT, a government entity; ESTATE
 OF BEECHER AVANTS; MICHELE
 WHITNEY, an Individual; O.R. "RAY"
 LYONS, an Individual,

Defendant.

Case No.: 2:21-cv-2170-JCM-NJK

**STIPULATION AND ORDER
 TO EXTEND DEADLINE FOR PLAINTIFF
 TO RESPOND TO DEFENDANT LAS
 VEGAS METROPOLITAN POLICE
 DEPARTMENT'S MOTION TO DISMISS
 PLAINTIFF'S SECOND AMENDED
 COMPLAINT [ECF 172] AND LYNN
 AVANT'S JOINDER TO MOTION TO
 DISMISS [ECF 173]**

Plaintiff Frank La Pena, by and through his counsel of record, Paola M. Armeni, Esq. and
 Gia N. Marina, Esq. of the law firm CLARK HILL PLC, Defendants Las Vegas Metropolitan
 Police Department, by and through their counsel of record, Craig R. Anderson, Esq., of the law
 firm Marquis Aurbach, and Non-Party, Lynn Avant by and through her counsel of record, Rusty
 Graf, Esq. of the law firm Black & Wadhams, respectfully submits this Stipulation extending time
 for Plaintiff to respond to Defendant's Motion to Dismiss [ECF 172], filed May 23, 2025, and
 Interested Party, Lynn Avant's Joinder to Defendants' Motion to Dismiss [ECF 173], filed on May
 28, 2025. Plaintiff's Response is currently due June 6, 2025. The parties agree to a (14) fourteen-
 day extension, making Plaintiff's deadline to file his Response, June 20, 2025.

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1 Although Plaintiff's counsel has been actively working on responding to Defendant's
2 Motion to Dismiss counsel requires a brief extension to complete the response. This request for
3 extension is made in good faith and not for the purposes of delay.

4 WHEREFORE, the parties stipulate that the time for Plaintiff to file his Response to
5 Defendant's Motion to Dismiss be extended to June 20, 2025.

6 APPROVED AS TO FORM AND CONTENT.

7 Respectfully submitted this 2nd day of June 2025.

8 By: /s/ Gia N. Marina
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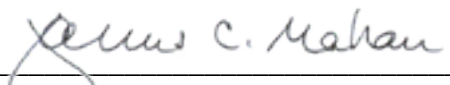
By: /s/ Craig R. Anderson
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Michele Whitney*

13
14 By: /s/Rusty Graf
15 Rusty Graf, Esq.
16 Nevada Bar No. 6322
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18 10777 W. Twain Ave., Suite 300
19 Las Vegas, Nevada 89135
20 *Attorneys for Non-Party Lynn Avants*

21 **ORDER**

22 **IT IS SO ORDERED:**

23 DATED: June 4, 2025

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25 _____
26 UNITED STATES DISTRICT COURT JUDGE
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